

# Exhibit 34:

## R.L. Declaration

**DECLARATION OF R.L.**

1. I am an inactive registrant of the Michigan Sex Offender Registry. I currently live in Illinois where I am also required to register. I was convicted of CSC-3 in 1989 in Michigan when I was 17 years old. I was sentenced to 10 years in prison and released early in 1998 when I was 26 years old. I was added to the Michigan registry in 1995 for a term of 25 years. I am now 50 years old and have been on the Michigan registry for over 27 years. I am required to register as a sex offender in both Michigan and Illinois for the rest of my life.

2. I was not required to register following my conviction because the registry did not exist at the time. I was added to the registry while I was still in prison in 1995. I was told that if I did not sign the registration papers, I would not be able to see my family, so I did. In 2011, my registration period was extended to life with no due process despite having committed no crimes since 1989. I was not in Michigan when my registration period was extended as I left the state in 2006. If my registration had not been extended, I would have come off the registry in 2020—3 years ago.

3. I moved to Illinois with my family in 2014 after living in Arizona after leaving Michigan. Because I am on the sex offender registry in Michigan when I moved to Illinois, I was required to register in Illinois. Because I am now a life registrant in Michigan, I am also a life registrant in Illinois. I am labeled as a predator in the state of Illinois despite the fact that if my crime had occurred in Illinois, instead of

Michigan, I would not be required to register at all, let alone for life. Instead, I am required to register as a sex offender for the rest of my life in Illinois because I am on the Michigan registry even though my original registration would already be over.

4. I have experienced harm due to being on the registry in every state I've lived in since being on the registry. I have been married to my wife since 2014 and we have two children aged 6 and 9. They have repeatedly been ostracized by our neighbors and community because I am on the registry. Neighbors have refused to let their children play with my children and my kids are left wondering what they did wrong.

5. I experience personal harassment from being on the registry, too. I have had the registry weaponized against me on several occasions. Once, a neighbor of mine who had found out I was on the registry called the police claiming I had assaulted my wife. Indeed, I have had the police called on me by neighbors on numerous occasions due to showing up on the registry. None of these calls have ever resulted in charges.

6. The reporting requirements have been an enormous burden on me and my family. I have had to take time off work to go report. I have had to play sick to get out of work. There were occasions when I went in to report but there was a technical issue or no staff, forcing me to take more time off work to try again.

7. Because the SORA requirements are overwhelming, I have been reincarcerated due to violating SORA. In most instances, the violation was for unpaid fees. Money is always tight, particularly because the registry makes it so hard to find employment. I was incarcerated several times because I had unpaid court fees which came up during registration, resulting in immediate jail time.

8. In the one instance that was not about fees, I was trying to transfer my Michigan registration to Arizona. I found out once I got to Arizona that I was supposed to get permission from Michigan before I tried to transfer my registration. I called the Michigan authorities and even sent them copies of my Arizona registration. I was still arrested for noncompliance, for which I was sentenced to and served 90 days, resulting in the loss of the job and apartment I had at the time.

I, R.L., certify under penalty of perjury that the above statement is true and correct pursuant to 28 U.S.C. § 1746.

R.L.\_\_\_\_\_

(name on file with Plaintiffs' counsel)

Dated: March 20, 2023